

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

BP AMERICA PRODUCTION
COMPANY, *et al.*

v.

NATIONAL OILWELL VARCO, LP,
et al.

§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 10-CV-01162
consolidated with NO. 09-CV-03360

EX PARTE MOTION FOR LEAVE TO EXCEED PAGE LIMITATION

Plaintiffs, BP America Production Company (“BP America”), BP Exploration & Production Inc. (“BPX&P”), and American Home Assurance Company (“American Home”), respectfully move the Court for leave to exceed the twenty (20) page limit for their Memorandum in Opposition to Motion for Partial Summary Judgment on Counterclaims for Contractual Indemnity filed by the NOV Defendants. Plaintiffs seek leave so that they may fully address the pertinent factual background and the many complex legal issues raised by defendants’ motion.

Respectfully submitted,

LISKOW & LEWIS

/s/ S. Gene Fendler

S. Gene Fendler (La. Bar No. 5510)

Admitted Pro Hac Vice

Attorney-in-Charge

701 Poydras Street

Suite 5000, One Shell Square

New Orleans, LA 70139

Telephone: (504) 581-7979

Facsimile: (504) 556-4108

E-mail: sgfendler@liskow.com

Attorneys for BP America Production Company, BP Exploration & Production Inc., and American Home Assurance Company

Of Counsel:

LISKOW & LEWIS

David W. Leefe (La. Bar No. 1479)

Admitted Pro Hac Vice

Carol Welborn Reisman (Tex. Bar No. 24052638)

Devin C. Reid (La. Bar No. 32645)

Admitted Pro Hac Vice

701 Poydras Street

Suite 5000, One Shell Square

New Orleans, LA 70139

Telephone: (504) 581-7979

Facsimile: (504) 556-4108

E-mail: dwleefe@liskow.com
cwreisman@liskow.com
dcreid@liskow.com

and

Robert Hayden Burns (Tex. Bar No. 03456000)

Federal I.D. No. 375

First City Tower

1001 Fannin Street, Suite 1800

Houston, TX 77002

Telephone: (713) 651-2900

Facsimile: (713) 651-2908

Email: hburns@liskow.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of September, 2010, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all attorneys of record. I further certify that, on the same day, I mailed, faxed, or e-mailed the foregoing document and notice of electronic filing to all attorney(s) of record who are non-CM/ECF participants.

/s/ S. Gene Fendler

927639_1